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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE JANIS L. SAMMARTINO)

| | | |
|---------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA, |) | Case No. 08CR0369 |
| |) | |
| Plaintiff, |) | DATE: March 21, 2008 |
| |) | TIME: 9:00 a.m. |
| v. |) | |
| |) | NOTICE OF MOTIONS AND MOTIONS: |
| CHEONG SAU WONG, |) | |
| |) | (1) TO COMPEL DISCOVERY; |
| Defendant. |) | (2) TO DISMISS THE INDICTMENT |
| |) | DUE TO MISINSTRUCTION OF THE |
| |) | GRAND JURY; |
| |) | (3) TO GRANT LEAVE TO FILE |
| |) | FURTHER MOTIONS. |

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
A. DALE BLAKENSHIP, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on March 21, 2008, at 9:00 a.m., or as soon thereafter as counsel may be heard, the defendant, Maria Vasquez, by and through her counsel, Leila W. Morgan, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

MOTIONS

The defendant, Cheong Sau Wong, by and through his attorneys, Leila W. Morgan, and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this

1 Court for an order to:

- 2 1) Compel discovery;
3 2) Dismiss the Indictment Due to Misinstruction of the Grand Jury;and
4 3) Grant leave to file further motions.

5 These motions are based upon the instant motions and notice of motions, the attached
6 statement of facts and memorandum of points and authorities, and all other materials that may come
7 to this Court's attention at the time of the hearing on these motions.

8 Respectfully submitted,

9 DATED: March 7, 2008

10 /s/ Leila W. Morgan
11 **LEILA W. MORGAN**
12 Federal Defenders of San Diego, Inc.
13 Attorneys for Mr. Wong
14 Leila_Morgan@fd.org
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CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

A. Dale Blakenship
U S Attorneys Office Southern District of California
Criminal Division
880 Front Street
Room 6293
San Diego, CA 92101
(619)557-5610
Fax: (619)235-2757
Email: Dale.Blakenship@usdoj.gov

Dated: March 7, 2008

/s/ Leila W. Morgan
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